

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE:

JAN 28 1993

SUBJECT: ACTION MEMORANDUM - Request for a Time-Critical Removal Action at the
New Carlisle Trailers Site, New Carlisle, Clark County, Ohio
(Site ID #SM)

FROM: Joseph J. Fredle, On-Scene Coordinator *Ron Z. Brown, for*
Emergency and Enforcement Response Branch - Section 1

TO: William E. Muno, Acting Director
Waste Management Division

THRU: Jodi L. Traub, Acting Associate Division Director
Office of Superfund



I. PURPOSE

The purpose of this memorandum is to request and document approval to expend up to \$290,000 in order to mitigate threats to public health and the environment at the New Carlisle Trailers site in New Carlisle, Ohio. Public health and environmental threats stem from cyanide compounds stored with incompatible ignitable and corrosive materials and from possible exposure to chlorinated solvents and aromatic compounds at the site due to accessibility.

Proposed removal actions include assessment of the chemical hazards on the site, securing the site to prevent public access, removal and or treatment of cyanide compounds, ignitable materials, corrosive materials and organic chemicals from the site.

This site is not on the National Priorities List (NPL), does not set any precedents, and is not nationally significant.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID = OHD 987 046 273

The Removal Action at the New Carlisle Trailers site is time critical.

The New Carlisle Trailers site is located on property owned by Arnold Wilhelm. The site consists of three semi-trailers, each filled with 55-gallon drums of hazardous substances. The trailers were first investigated in March 1990 by the Ohio Environmental Protection Agency (OEPA). One trailer is located at 1761 Liberty Road, New Carlisle, Ohio, and the other two are at 8081 Lower Valley Pike, New Carlisle, Ohio.

The Liberty Road property has one trailer parked 15 feet from Liberty Road. The trailer is located approximately 250 feet north of the Wilhelm residence, 100 feet northwest from two mobile homes and a barn. The trailer contains over sixty-two 55-gallon drums and numerous other containers. In March 1991, OEPA inventoried and sampled these drums and containers and observed the trailer to be leaking an oily substance. Sampling results found that a cyanide compound was stored next to a leaking drum of acid liquid. This arrangement can potentially lead to the formation of the highly poisonous hydrogen cyanide gas if the two materials were to come in contact.

The Lower Valley Pike property contains two trailers. Both are located at the northwest end of the property. An active sandblasting operation and a retail store are also located on the property. The trailers are located approximately 40 feet from Lower Valley Pike and 60 feet from the sandblasting operation. In March 1991, the OEPA inventoried and sampled the contents of the two trailers. The OEPA determined that the trailers contained seventy-three 55-gallon drums, three 30-gallon drums, one hundred 5-gallon pails and seventy 1-gallon buckets. Sampling results indicated that the drums contained RCRA-hazardous substances, including flammable materials, corrosive materials, acetone, methylene chloride, toluene, and xylene. The trailers were observed to be leaking material at the time of inspection. This poses a possible threat of exposure to the population of the area through fire/explosion and resulting emissions/direct contact. The OSC has discussed the site and U.S. EPA's intended actions with Jim Crawford of the OEPA.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the New Carlisle Trailers site meet the criteria for a removal action as stated in the National Contingency Plan (NCP), Section 300.415(b)(2), specifically:

- 1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

The New Carlisle Trailers site is located on property owned by Mr. Arnold Wilhelm. He and his wife live 250 feet from a trailer that contains drums and other containers of potentially hazardous materials, observed to be in deteriorated condition and leaking wastes. The trailer located on the Liberty Road property contains incompatible cyanide wastes and leaking corrosives and creates an immediate threat to nearby populations due to the potential for formation of poisonous hydrogen cyanide gas.

- 2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

The three unsecured trailers located on the New Carlisle Trailers site have been observed to contain approximately one hundred thirty-five 55-gallon drums and a large number of other containers in poor and deteriorated condition. Waste has been observed seeping from the trailers. With continued deterioration of the containers, the incompatible cyanide wastes and corrosive wastes can potentially react to create hydrogen cyanide gas.

3) Threat of fire or explosion;

The trailers at the New Carlisle Trailers site have wastes that have been characterized as ignitable from sampling performed on March 20, 1990, and March 3, 1991, by the OEPA. Due to the proximity of these wastes to nearby residents and recreational areas (softball fields) a public health endangerment exists, not only through fire and explosions, but through resulting emissions as well.

IV. ENDANGERMENT DETERMINATION

Given the insecure site conditions, the nature of the hazardous substances on the site, and the potential exposure pathways to nearby populations described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The On-Scene Coordinator (OSC) proposes to undertake the following actions to mitigate threats posed by the presence of hazardous wastes and substances at the New Carlisle Trailers site:

- 1) Establish site security.
- 2) Develop and implement a site Health and Safety Plan.
- 3) Sample and properly dispose of contents of the trailers.
- 4) Identify, inventory, characterize and properly dispose of all hazardous substances contained in the area.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

All applicable or relevant and appropriate requirements (ARARs) of Federal Law will be complied with to the extent practicable. A letter

was sent to Don Schregardus of the OEPA on September 15, 1992, requesting that the agency identify State ARARs. Any State ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

The OSC has determined there is no need for provisions for post-removal site control, consistent with the provisions of Section 300.415(k) of the NCP.

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 34 on-site working days to complete. Detailed cleanup contractor costs are presented in Attachment 1, with the estimated projected costs presented below.

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Cleanup Contractor Costs	\$160,000
Contingency (20%)	32,000
	<hr/>
Subtotal	\$192,000
Total TAT, including multiplier costs	28,000
	<hr/>
Subtotal, Extramural Costs	\$220,000
Extramural Costs Contingency (20%)	44,000
	<hr/>
TOTAL, EXTRAMURAL COSTS	\$264,000

INTRAMURAL COSTS:

U.S. EPA Direct Costs [\$30 X (300 Regional Hrs + 30 HQ Hrs)]	\$ 10,000
U.S. EPA Indirect Costs (\$53 X 300 Regional Hrs)	16,000
	<hr/>
TOTAL, INTRAMURAL COSTS	\$ 26,000
	<hr/>
TOTAL REMOVAL PROJECT CEILING ESTIMATE	\$290,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase the potential for the release and migration of hazardous materials. The drums will continue to deteriorate and will

eventually release their contents. The potential also exists for vandals to cause a release by upsetting drums or starting a fire. The proximity of the trailers to residences and operating businesses magnifies the potential impact of any release.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the New Carlisle Trailers site, Clark County, Ohio, developed in accordance with CERCLA as amended, and is not inconsistent with the National Contingency Plan. This decision is based on the Administrative Record for the site. Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$290,000. Of this, an estimated \$236,000 may be used for the cleanup contractor's costs.

APPROVE: *William Spindler* DATE: 1/22/93
Acting Director, Waste Management Division

DISAPPROVE: _____ DATE: _____
Acting Director, Waste Management Division

Enforcement Addendum

Attachments

- 1) Detailed Cleanup Contractor Estimate
- 2) Administrative Record Index

cc: T. Johnson, OS-210
Sheila Huff, U.S. Department of the Interior
Ohio Environmental Protection Agency, State Superfund Coordinator

bcc: A. Bauman, HSRL-5J
R. Powers/R. Buckley, HSE-GI
R. Bowden, HSE-5J
J. Cisneros, HSE-5J
L. Fabinski, ATSDR, HRL-5J
S. Dorsey, CRU, HSRLT-5J7
T. Lesser, P-19J
F. Myers, MF-10J
EERB Read File (M. Johnson)
EERB Deliver Order File (C. Brasher)
EERB Site File (Char Gwizala, SF Central File Room)
Contracting Officer, MC-10J
J. Fredle, OSC, HSE-GI
B. Warning, ORC, CS-3T
M. Messersmith, HSE-5J

ENFORCEMENT ADDENDUM

ENFORCEMENT CONFIDENTIAL INFORMATION

Redacted-information not relevant to the selection of the removal action.

ATTACHMENT 1

DETAILED CLEAN-UP CONTRACTOR ESTIMATE
NEW CARLISLE TRAILERS SITE
NEW CARLISLE, CLARK COUNTY, OHIO

OCTOBER 1992

Personnel and Equipment	\$ 80,000
Disposal/Transportation	80,000
Contingency (20%)	32,000
	<hr/>
TOTAL	\$192,000

ATTACHMENT 2
ADMINISTRATIVE RECORD
FOR
NEW CARLISLE TRAILERS

CLARK COUNTY, OHIO

October 19, 1992

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
03/20/90	OhioEPA	File	Field Report	5
03/29/90	Palmer, W., OhioEPA	File	Field Report	1
03/04/91	Shane, S., Kotsko, C., OhioEPA	File	Field Report	2
00/00/00	Fredle, J., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum (Pending)	